

OCCURRENCE REPORTING PROGRAM-PROPOSED INTERPRETATION PROCESS

For

ORPS Criteria and Requirements

By

EFCOG ORPS Criteria Interpretation
Task Team

April 2006

Proposed process for identifying, interpreting, and publishing DOE O 231.1A, DOE M 231.1-2, and DOE G 231.1 by DOE and DOE Contractor Organizations

Scope

The scope of this proposal includes a process to obtain interpretations to the requirements and criteria associated with the Occurrence Reporting and Processing System (ORPS). This paper outlines a process for gathering field issues related to ORPS, for DOE HQ to provide interpretation and guidance on the field issue, to publish and notify ORPS users of posted interpretations and guidance, and to identify and recommend relevant interpretations, guidance, and corrections for future publication in the 231 Manual and Guidance documents.

Proposed Process – Infrastructure Requirements

- Set up an email listing available from the ORPS Interpretation EFCOG webpage (<http://www.efcog.org/wg/ism/index.htm>) of DOE contractor personnel with ORPS responsibilities. This is to replace the inactive Occurrence Reporting List server link. Similar to the previous listing. Access to this list should be restricted to DOE and DOE contractor personnel. The email listing will include the principal contact(s) from each contractor and will be used to communicate the rollout of the interpretation/guidance process. Later, the ORPS prime contractor list will be embedded as moderators into the EFCOG discussion forum as a general discussion forum entitled “ORPS Interpretations” and will provide a mechanism to communicate pertinent information related to this process such as announcement of new draft interpretations, contractor comment made to draft interpretations, and this list would also be used to inform DOE contractors of pertinent information such as future ORPS Task Group meeting announcements.

A process is needed that would support the automatic addition and deletion of names to this mailing list and that would automatically update the moderators in the discussion forum. In addition, this process should provide a searchable alphabetic listing of the principal contacts from each contractor to facilitate peer-to-peer communication.

- A webpage on the EFCOG website would need to be developed and maintained to support ORPS Interpretations. This webpage would store an on-line interpretation form. Three other sections of this webpage will be necessary to support this process. A section entitled: ‘EH-32 Review/Approval Pending’ for interpretation forms that have been vetted through the contractor review cycle and have been sent to EH-32 for concurrence/non-concurrence. Other sections that would need to be developed would be a status section that will provide a current status of requested interpretation forms and an archives section where final EH-32 dispositioned interpretations would be maintained.

- An ‘ORPS Interpretation’ general discussion forum would need to be developed within the EFCOG ISM discussion forum. This forum would be the pathway to communicate with the primary ORPS contacts at each site that a new interpretation has been posted. The forum would also be used by contractors to make comment on draft interpretation.
- An on-line ORPS Interpretation form similar to the form found in Attachment A of this paper will need to be developed and placed on the ORPS interpretation website. This form must have the capability of allowing the user to complete the form on-line and submit. Submission of the form should automatically generate an email to the ORPS Task Team Leads and the form should be automatically saved in the New Draft Interpretation section of the webpage. The proposed ORPS interpretation form will allow the contractor to identify the specific criterion or requirement in question, provide an explanation of the issue (examples if possible), a proposed interpretation, and ultimately will document DOE’s resolution.

Attachment C provides the entire process flowchart to include all critical inputs and outputs, and infrastructure requirements to support this process.

Proposed Process

- Contractor requests interpretation of criteria or requirement by use of the ORPS Interpretation on-line form. Upon submittal by the contractor, the interpretation form would automatically be saved in the Draft Interpretation section of the webpage and an automated email will be sent to the ORPS Task Team Leads informing them that a new request for interpretation has been submitted.
- Upon notification that an interpretation has been requested, the ORPS Task Leads will review the Interpretation form and ensure the request is understandable. If clarification is needed, the ORPS Task Leads will contact the individual that submitted the form. Any revisions needed to clarify the interpretation request will be made by the ORPS Task Team Leads. This step will be completed within 2 working days.
- The ORPS Task Team Leads will then notify ORPS primary contacts of the draft interpretation using the ORPS Interpretation forum. The forum will automatically notify all moderators (ORPS primary contacts) by way of an email message. The notification will include a brief description of the interpretation requested, provide information on where the draft interpretation can be found, and invite comment. This task should be completed within 1 working day.
- After notice, ORPS primary contacts will have 12 working days to make comment on the draft interpretation by use of the ORPS Interpretation forum.

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- The ORPS Task Team Leads will have 5 working days to resolve comments and send the interpretation to EH-32 (orpssupport@eh.doe.gov).
- EH-32 will be responsible for sending the interpretation request to the appropriate DOE subject matter expert(s) (SME) for final resolution. The SME review and formal interpretation should not take longer than 15 working days.
- EH-32 will send all completed interpretation forms to the ORPS Task Team Leads after the final disposition has been determined (concurrence / non-concurrence).
- EH-32 will contact ORPS Task Team Leads for any additional information needed.
- Once the interpretation/guidance has been approved, EH-32 will publish it onto their website (<http://www.eh.doe.gov/paa/interps.html>) as official interpretation/guidance and will document their approval (with or without modification) on the form. Non-concurrence will also be documented on the form with justification for the non-concurrence. Regardless of the outcome of the determination, feedback should be provided directly to the original submitter.
- The ORPS Task Team Leads will post completed forms on the EFCOG ORPS Interpretation website under Archives.
- The ORPS Task Team Leads will update the Interpretation status sheet.
- The ORPS Task Team Leads will send notice of the final disposition of requested interpretations by use of the ORPS Interpretation forum
- All formal interpretation/guidance will be considered by EH-32 for future order, manual, and guidance revisions.
- Once all elements of this process are put in place and the process has been approved, an email will be sent to the ORPS primary contacts email listing to announce the process and invite usage.

Attachment B provides the general process flowchart that contractors requesting interpretation will follow.

Proposed Quick Interpretation Process

- Contractor site uses the same process they have used to this point (namely, calling Jennie Boyle). Once EH-32 has provided an interpretation, the contractor will solicit a formal interpretation using the formal process. The interpretation form submitted by the contractor should clearly state a quick interpretation has been made by DOE. The contractor will also provide a description of the quick interpretation in the interpretation form

References

Occurrence Reporting and Processing of Operations Information, DOE M 231.1-2

Occurrence Reporting and Performance Analysis Guide, DOE G 231.1-1

Occurrence Reporting Causal Analysis Guide, DOE G 231.1-2

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Attachment A

Criteria/Requirements Comment Submittal/Resolution Form

=====
Site: _____ **Submitter's Name:** _____ **Date:** _____
Organization: _____ **Phone:** _____
E-Mail: _____
=====

Document: (ORPS Order, ORPS Manual, Causal Guide, Causal Manual, etc.)

Issue Area Within Document (i.e., Criteria #, Section #, etc. with page number last): _____

Issue:

Background/Justification:

Proposed Interpretation/Resolution:

=====
DOE Staff Disposition:

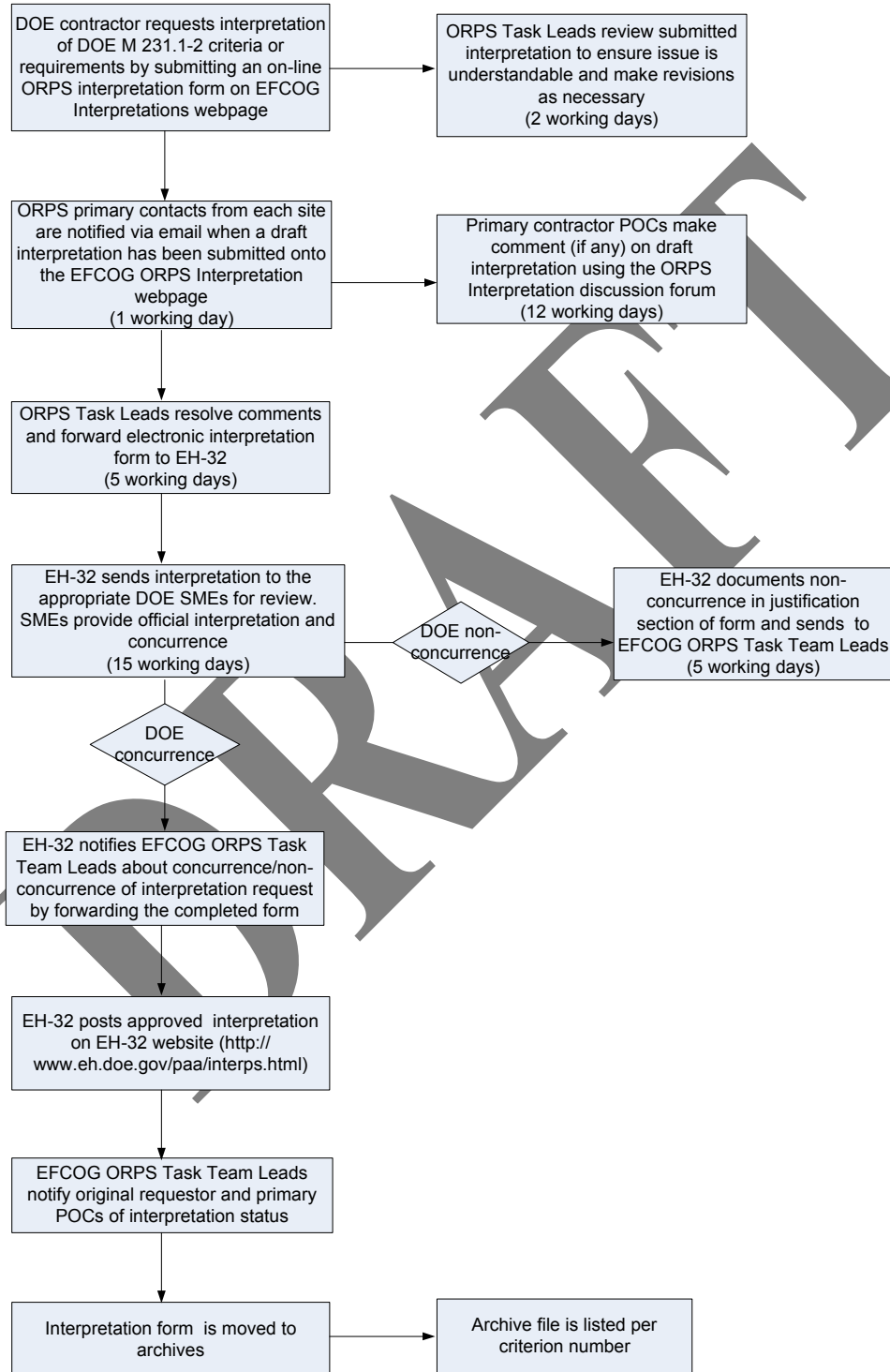
Accept ____ **Accept as Modified** ____ **Reject** ____

Comments:

DOE Approved Interpretation:

Attachment B

ORPS Interpretation General Process Flowchart



Attachment C

ORPS Interpretation Process Flowchart

